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Los Alamos
National Laboratory

Risk Reduction and Environmental Stewardship Division

Meteorology and Air Quality Group
(RRES-MAQ)

Quality Assurance Project Plan

for the

Regulatory Review and Permitting Task

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General Information

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Appendixes

This plan has the following appendixes:

Number	Appendix Title	No. of pages
A	Permits	1
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General Information, continued

History of revision

This table lists the revision history of this plan.

Revision	Date	Description of Changes
0	5/22/03	New document.
1	9/26/03	Added new block on applicability of 20.2.27 Construction Permits.

Section 1
Quality Program

Organization

Introduction

This plan specifies how the Regulatory Review and Permitting Team stays current with applicable requirements promulgated in the Federal Clean Air Act and State Air Quality Control Act (collectively referred to as the CAA requirements), reviews projects for applicable air quality requirements, prepares permit applications, and supports customers.

Team mission

The Regulatory Review and Permitting Team contributes to LANL's compliance with the CAA requirements by:

- Reviewing and interpreting potentially applicable air quality regulations,
- Identifying applicable air quality regulations for new or modified sources,
- Permitting applicable sources, and
- Documenting and communicating regulatory assessments.

Requirements

The drivers for the development and implementation of the Regulatory Review and Permitting Team are all the applicable regulations in Title 20 Environmental Protection, Chapter 2 Air Quality, of the New Mexico Administrative Code (20.2 NMAC) and those regulations found in 40 CFR 50 - 93 (Air Quality Programs) promulgated from the CAA requirements.

Group purpose

The Meteorology and Air Quality Group (MAQ) of the Risk Reduction and Environmental Stewardship (RRES) Division is responsible for maintaining Clean Air Act compliance expertise for the Laboratory including a detailed knowledge of existing laws and regulations and how they apply to the Laboratory. MAQ will assist line managers and supervisors in identifying and addressing air quality issues, as described in the LIR 404-10-01, "Air Quality Reviews." MAQ is the Laboratory's single point of contact to regulators on Clean Air Act issues.

Organization, continued

Team organization

The Regulatory Review and Permitting Team is managed by a team leader who reports to the MAQ Group Leader. See the MAQ Group Quality Management Plan (MAQ-QMP) for a description of the group organization and chains of authority.

Integration within MAQ

The Regulatory Review and Permitting Team takes the lead in maintaining Clean Air Act compliance expertise for the Laboratory and in working with regulators on Clean Air Act issues. The team performs regulatory analysis, air quality reviews, and obtains permits. Once applicable regulatory requirements are identified and permits are obtained, the team enlists the help of the Title V Team, the Reporting Team, or the Rad NESHAP Team for the development and implementation of a compliance plan. Therefore, these teams are collectively called the compliance team.

Function of compliance team

The responsibilities of the compliance team are beyond the scope of this QAPP. Those responsibilities include the design and implementation of programs that demonstrate the continuous compliance for all applicable air quality regulations and permit conditions identified by the Regulatory Review and Permitting Team. The compliance team is also responsible for periodic compliance and certification reporting to meet required regulations or permit conditions.

Related quality plans

The regulatory compliance programs are organizationally separated within MAQ and are covered in separate quality plans. Some examples of the regulatory compliance program quality plans include the following:

- 40 CFR 61, Subpart M, Asbestos NESHAP (MAQ-ASBESTOS)
- 40 CFR 61, Subpart H, Rad-NESHAP (MAQ-RN)
- 40 CFR 61, Subpart C, Beryllium NESHAP (MAQ-BeNESHAP)

Organization, continued

Implementation The following table lists specific responsibilities.

Who	What
Regulatory Review and Permitting Team Leader	Manage the tasks and staffing of the team in order to deliver the team products. Define and document the team's planned goals and deliverables in this project plan. Track team budget, schedule, and progress. Recruit or request team members to work for the team. Plan, assign and manage tasks in order to ensure the following: • personnel are properly trained for the task. • personnel follow prescribed work procedures, safety guidance (including LIR300-00-01, "Safe Work Practices"), and security requirements. • tasks are completed on schedule, on budget, and meet quality specifications. Communicate with staff and provide guidance, peer review, and technical problem resolution. Evaluate the productivity and suitability of staff and recommend changes, as needed, to increase the productivity and skill level of staff.
Regulatory Review and Permitting Team members	Accomplish the assigned work in a manner that meets quality specifications, safe work practices, security guidelines, regulatory requirements, and specified timetables. Communicate with Team Leader on progress of work assignments. Inform the compliance team of new sources, new requirements, new permits, revisions to permits, and changing conditions to ensure that compliance personnel are assigned to design and implement procedures and to interact with operations personnel for each compliance program. Account for the delivery of all work assignments. Bring technical problems with work assignments to the attention of the Team Leader.

Section 2

Personnel Development

Personnel Training and Qualification

Personnel requirements

Qualified Regulatory Review and Permitting Team members will be hired and trained as prescribed in the group QMP.

Personnel are required with knowledge in one or more of the following:

- Federal and State CAA requirements
- Air quality permitting
- Chemical engineering
- General engineering principles, including emissions estimates
- Compliance assurance principles
- Laboratory operations

Training

As required by the group QMP, all personnel performing team-related work are required to obtain appropriate training prior to performing work governed by a procedure. The Regulatory Review and Permitting Team Leader will determine training needs. Training to a procedure constitutes authorization to perform the work. Training for MAQ personnel will be performed and documented according to MAQ-024 ("Personnel Training") and MAQ-032 ("Orienting New Employees").

Professional development and training is encouraged. Opportunities for training will be considered with the allocation of resources.

Implementation

The following table lists specific responsibilities.

Who	What
Regulatory Review and Permitting Team Leader	Follow all requirements for personnel training as given in MAQ-QMP.
Regulatory Review and Permitting Team members	Determine if training is required and ensure training is completed before starting work. Comply with training requirements in MAQ-QMP. Identify opportunities for professional development.

Section 3
Quality Improvement

Improving Quality

Objectives and goals

Regulatory Review and Permitting Team will help Laboratory operating entities apply for, negotiate, and comply with air quality permits required by State and Federal CAA requirements. The Air Quality group will provide Laboratory operations with solutions allowing needed operational flexibility while minimizing costs for maintaining compliance and minimizing the Laboratory's impact on the environment.

Progress reports

Personnel assigned to perform Regulatory Review and Permitting Team activities provide periodic verbal or written updates to the Regulatory Review and Permitting Team Leader. These updates are used by the Team Leader to determine team focus.

The Team Leader provides periodic verbal or written updates to the Group Leader and/or Deputy Group Leader. These updates are used to keep group management apprised of the focus of Regulatory Review and Permitting Team activities, improvements, or shortcomings.

The Regulatory Review and Permitting Team Leader will prepare (or direct personnel to prepare) progress reports. These progress reports will address items such as:

- Task advancements and accomplishments made toward Regulatory Review and Permitting Team goals and deliverables.
- Audit/assessment activities relating to quality assurance of Regulatory Review and Permitting Team activities.
- Problems or deficiencies identified during assessment activities or during routine performance of work.
- Identification of non-routine assignments or tasks.

Improving Quality, continued

Progress report distribution

The following personnel receive copies of team progress reports as part of the normal routing and distribution:

- MAQ Group Leader
- MAQ Deputy Group Leader
- MAQ Quality Assurance Officer
- MAQ Project and Team Leaders
- MAQ Regulatory and Line Services personnel

Corrective actions within MAQ

Corrective actions for all MAQ teams are initiated, tracked, corrected, and documented according to the group Quality Management Plan and group procedure MAQ-026, "Deficiency Tracking and Reporting."

Deficiency trending

At least once a year, the Regulatory Review and Permitting Team Leader reviews the deficiency reports to look for trends in the occurrence of deficiencies. Trending is intended to determine the existence of systematic design or implementation problems. If trends are identified, the trending analysis results are documented in a memo or report, forwarded to the MAQ Group Leader and Deputy Group Leader, and copied to the MAQ records management system.

Improving Quality, continued

Potential deficiencies

MAQ must comply with demands in state, federal, and LANL/DOE laws, regulations, and requirements. The group also imposes additional requirements on itself as given in group quality plans, project plans, and procedures. A deficiency occurs when one of these requirements is not met. The group has adopted the word "deficiency" to replace other commonly used terms such as finding, condition adverse to quality, and nonconformance.

Deficiencies are not intended to be punitive and are never to be initiated as retaliation against an individual. The principle is to identify the root causes and fix the system that caused the error, not to punish the mistake or failure.

The following are examples of potential deficiencies:

- External reporting of bad or incorrect data that affects the compliance status of an emission unit or LANL
- Reporting of bad or incorrect data that will have long term implications
- Failure to notify a facility customer in an air quality review of applicable requirements that affect the compliance status of an emission unit or LANL
- Identification of a source that has applicable regulatory requirements (that should have been identified previously)
- Assessment findings
- Violation of permit requirements

Grammatical or typographical errors will not be considered a deficiency unless the error results or could result in misunderstanding or misinterpretation of the data.

Implementation

The following table lists specific responsibilities.

Who	What
Regulatory Review and Permitting Team Leader	Annually trend deficiencies and, as necessary, implement appropriate changes in the team to correct systematic problems. Provide periodic written or verbal reports to the Group Leader.
Regulatory Review and Permitting Team members	Document all violations of requirements in deficiency reports according to MAQ-026.

Section 4
Documents and Records

4.1 Documents and Records

Policy

The Regulatory Review and Permitting Team will establish recordkeeping requirements and will assure the maintenance of these records at a level sufficient to demonstrate compliance with all applicable CAA requirements covered by this plan.

Critical data that are maintained in electronic form (e.g., databases and spreadsheets) will be maintained in a manner consistent with MAQ software quality assurance requirements and applicable procedures.

Records policy

Records will be maintained according to MAQ group policy as described in MAQ-QMP. Appropriate and sufficient records will be maintained for a minimum of five years. The number, type, and detail of all records to be kept will be sufficient to describe and defend regulatory assessments, basis for emissions estimates, source and activity applicability, and permitting activities. Implementing procedures also specify the records, forms, logbook entries, or other information to be kept as documentation of the performance of the procedures.

Document control

This plan is controlled through the MAQ document control procedure (MAQ-030, "Document Distribution"). The following personnel receive controlled copies of this plan:

- MAQ Group Leader
- Regulatory Review and Permitting Team Leader
- Rad-NESHAP Team Leader
- Air Quality Monitoring Team Leader
- Title VI Team Leader
- MAQ personnel assigned to perform Regulatory Review and Permitting Team activities
- MAQ Quality Assurance Officer
- Assistant Area Manager, Office of Environment and Projects, DOE Los Alamos Area Office

4.1 Documents and Records, continued

Procedures

Procedures will be developed as necessary, as time and funding permit, and in accordance with the policy in the group QMP and procedure MAQ-022 ("Preparation, Review, and Approval of Procedures").

Records series

Documentation of Regulatory Review and Permitting Team activities is maintained as records by the MAQ Records Coordinator. These records are maintained in several series according to type of record and are arranged by subject. These record series are described below.

Team records

Regulatory Review and Permitting Team records include a series for the operating permit, source permits, new source reviews, and regulatory reviews. These team records may include correspondence with the regulators, copies of applications and permits, background material, equipment specifications, emissions estimates, reference and guidance materials, public notice information, exemption notices, modeling results and documentation, and comments from legal counsel and DOE.

The following outline describes the general contents of the Regulatory Review and Permitting Team record series. These are working records and additional information will be added to the record series when new sources are installed at LANL, or when new regulatory requirements become applicable to LANL.

1) **Permit Application/ Permit Records**
   a) Source/facility information,
   b) Insignificant and exempt source descriptions,
   c) Permit/registration application,
   d) Receipt or confirmation of delivery,
   e) Application for modification or revision to permit or registration,
   f) Permit or response from regulating agency,
   g) Public notice information,
   h) Emissions estimates and documentation of emission factors,
   i) Reference and guidance materials,
   j) Modeling results and documentation,
   k) Comments or guidance from the regulating agency,
   l) Comments from legal counsel and DOE,
   m) Confirmation of classification and security reviews,
   n) Comments and documentation from the operating group or source owner

4.1 Documents and Records, continued

2) **Air Quality Review Records**
   a) Project description,
   b) Air quality assessment with identification of regulatory requirements,
   c) Emissions estimates and documentation of emission factors,
   d) Exemption notifications,
   e) Reference and guidance materials,
   f) Correspondence with the operating group or source owner.

3) **Regulatory Review Records**
   a) Applicability determinations
   b) Supporting documentation which may include emission calculations, and regulatory analysis

Disposition and retention

Active files will be maintained and kept by assigned Regulatory Review and Permitting Team personnel. After files have been finalized and all documentation is complete, these files will be submitted as records to the Records Coordinator. Records will be archived in compliance with Laboratory and DOE requirements for records retention, storage, and management and procedure MAQ-025, "Records Management."

Implementation

The following table lists specific responsibilities.

Who	What
Regulatory Review and Permitting Team Leader	Ensure all personnel in the team are aware of the records that must be preserved.
Regulatory Review and Permitting Team members	Ensure all records listed above are properly collected, filed, and preserved.

4.2 Electronic media

Policy

The Regulatory Review and Permitting Team will utilize electronic means to maintain data and perform calculations on these data. Electronic means will not replace paper copy. All records that must be maintained to meet the applicable requirements will be kept in hard copy as the official record.

The preferred electronic means for data storage is a Microsoft Access database. However, until database implementation is complete, the use of spreadsheets will be acceptable provided that the function of such spreadsheets can be demonstrated through appropriate validation and verification methods.

Databases

Backups -- All databases used to hold data and generate reports to be used to demonstrate permitting needs or compliance will be maintained on the "Databases" drive of the Air Quality server. These databases will be backed up daily to minimize potential losses of data.

Verification of data -- All compliance-related data uploaded into a database will be verified to be accurate against the original paper copy. Data that are uploaded through electronic means will undergo peer verification. Data that are uploaded through manual means will undergo 100% verification. The 100% review must be performed by someone other than the data entry person. This review will be documented and forwarded to the appropriate record series.

Verification of calculations -- All compliance-related calculations performed in a database through queries will be reviewed for accuracy by a person other than the person who generated the query. This review will be documented and forwarded to the appropriate record series.

Software control -- The integrity of all databases will be ensured by maintaining them on the Air Quality server. This will enable the MAQ database administrator to control access to these databases to only trained authorized persons. See the group QMP for additional information on software quality assurance.

4.2 Electronic media, continued

Spreadsheets

Backups -- All spreadsheets used to hold data and generate reports to be used to demonstrate permitting needs or compliance will be maintained in a secure location. The preferred location is on the Air Quality server. Spreadsheets will be backed up at least weekly.

Verification of data -- All compliance-related data uploaded into a spreadsheet will be verified to be accurate against the original paper copy. Data that are uploaded through electronic means will undergo peer verification. Data that are uploaded through manual means will undergo 100% verification. The 100% review must be performed by someone other than the data entry person. This review will be documented and forwarded to the appropriate record series.

Verification of calculations -- A person other than the person who generated the spreadsheet will review for accuracy all compliance-related calculations performed in a spreadsheet. This review will be documented and forwarded to the appropriate record series. Modifications to the function of these spreadsheets will also be verified in this manner.

Software control -- The integrity of spreadsheets will be ensured by limiting access to only trained, authorized personnel. See the group QMP for additional information on software quality assurance.

Implementation

The following table lists specific responsibilities.

Who	What
Regulatory Review and Permitting Team members	Ensure that all spreadsheet and database calculations are verified and validated for accuracy in compliance with the requirements above. Ensure all data entered into a database or spreadsheet are verified as specified in the requirements above. Ensure all spreadsheets and databases are properly backed up in compliance with the requirements above.

Section 5
Work Processes

5.1 Planning and Performing Work

Purpose of work processes

The Regulatory Review and Permitting Team performs work to maintain an understanding of the Federal and State CAA requirements; to identify applicable requirements for new and modified activities, projects, processes, and equipment; and to obtain and negotiate permits when they are needed.

Requirements

The potentially applicable requirements are contained within Air Quality Regulations documented under the Federal and State CAA requirements. A summary of relevant regulations is presented in the 2002 Title V Operating Permit application Section 4.1.

Policy

Work that contributes to achieving the quality specifications of Regulatory Review and Permitting Team deliverables will be planned, performed, and documented as stated in this plan and appropriate implementing procedures (see MAQ-QMP, Section 5). The Regulatory Review and Permitting Team Leader will provide first-line supervision of personnel assigned to team tasks to ensure work is performed to achieve quality specifications. Work planning will be consistent with the principles of Integrated Safety Management (ISM) and in compliance with LIR 300-00-01, LIR 300-00-02, and work-planning requirements in MAQ-QMP.

5.2 Regulatory Analysis

Purpose

The purpose of regulatory analysis is to maintain accurate and up-to-date knowledge of all existing, new, and proposed Federal and State Air Quality regulations and determine their potential applicability to existing sources at LANL.

Requirement

As the office of institutional coordination (OIC) for institutional air quality compliance, MAQ will develop and maintain technical and regulatory understanding of proposed and final air quality regulations within 40 CFR Parts 50 to 99 and 20.2 NMAC which regulate the types of activities or sources present at LANL. This includes all construction and Title V permit regulations.

Policy

Applicability determinations will be conducted for proposed and final federal and New Mexico regulations which may apply to LANL. Proposed air quality regulations which are applicable to the type of activity or source at LANL will be identified and tracked until becoming final. All applicability determinations will be documented and peer reviewed as appropriate. Applicable and potentially applicable requirements with extensive impacts to LANL and costly compliance programs will be subject to more extensive reviews and peer reviews. An analysis will be conducted of any new final regulation applicable to LANL to determine the need for the development of compliance initiatives and strategies (e.g., Laboratory Implementing Requirements (LIRs), record keeping, reporting, monitoring, permitting, etc).

Resources

The following resources may be used to obtain a copy of newly proposed or final federal or New Mexico air quality regulations.

- EPA proposed and final regulations published in the *Federal Register* may be obtained from the U.S. EPA CAA Listserver's web interface at https://lists.epa.gov/cgi-bin/lyris.pl.
- Proposed and final New Mexico regulations may be obtained from the NMED Air Quality Bureau's website at http://www.nmenv.state.nm.us/aqb.

Notice of public hearings before the NM Environmental Improvement Board (EIB) regarding adoption of proposed air quality regulations may be obtained by placement on the contact list maintained by the EIB Administrator or review of the *New Mexico Register* at http://www.nmcpr.state.nm.us/nmregister.

Implementation

The following table lists specific responsibilities.

5.2 Regulatory Analysis, continued

Who	What
Regulatory Review and Permitting Team Leader	Assign employees to review regulatory registers and regulations in order to determine LANL applicability. Assign employees to develop, distribute, peer review, and document the interpretations and applicability determinations. Assign employees to develop, distribute, peer review, and document potential to emit applicability determinations for Laboratory sources. Ensure timely notification of applicable requirements for LANL operations to facility personnel.
Regulatory Review and Permitting Team members	Determine applicability to LANL operations for each final regulation which regulates a type of activity or source present at LANL. Summarize the rule's potential applicability and ensure an applicability review of the final rule is conducted for each proposed regulation which potentially regulates a type of activity or source present at LANL. Document applicability reviews of final and proposed regulations and ensure documentation is generated and maintained in the records room. Comment on and contribute to the development of proposed regulations that may impact LANL. Involve affected facility customers in the regulatory analysis process to ensure that LANL interests are best represented. Involvement may include meeting with the regulators, providing input, etc. Collect source information to make regulatory applicability determinations. Obtain reviews for all applicability determinations. Reviewers may include MAQ management, legal counsel, DOE, and other LANL personnel, as appropriate. Contribute to the initiation and proposal of possible compliance assurance programs. Develop and document a uniform and defensible policy and implementation plan for 20.2.72 NMAC Construction Permitting. Inform the applicable group personnel of new requirements and changing conditions.

5.3 Air Quality Review

Purpose

The purpose of Air Quality Review (AQR) is to review all new and modified Laboratory activities and projects to ensure CAA requirements are met in accordance with the regulatory timelines and guidelines.

Requirement

Specific compliance requirements for individual projects may be source-specific (e.g., monitoring requirements, pre-construction approvals, etc.) or may encompass the entire Laboratory (e.g., Operating Permit Hazardous Air Pollutant thresholds, Prevention of Significant Deterioration, etc). In particular, the AQR process is used to:

- Determine whether new or changed projects at the Laboratory are *modifications* as defined in 20.2.72 NMAC, 20.2.70 NMAC, and 20.2.74 NMAC.
- Determine whether new or changed projects at the Laboratory that emit radionuclides are *modifications* or *new construction* as defined in 40 CFR 61 Subpart H.
- Identify any additional CAA requirements applicable to new or changed projects.

Policy

The Regulatory Review and Permitting Team will evaluate new, changed, or relocated activities, processes, or projects to determine applicable CAA requirements and to ensure that the requirements are met in accordance with the regulatory timelines. Team personnel will identify all applicable CAA requirements, outline preliminary compliance initiatives, and work with MAQ group personnel to ensure that compliance initiatives are implemented. Sound engineering principles (in the absence of specific regulatory direction) will be used to estimate potential and actual emissions. All applicability determinations and emissions calculations will be peer reviewed, documented, and maintained.

5.3 Air Quality Review, continued

Implementation The following table lists specific responsibilities.

Who	What
Regulatory Review and Permitting Team Leader	Assign employees to perform air quality reviews to identify all applicable requirements for new and modified projects at the Laboratory. Ensure that newly identified applicable requirements are communicated to the compliance team so that compliance programs are developed and implemented for every source and the facility. Ensure team members are trained to and working to the most current regulatory applicability determinations, interpretations, and guidance. Contribute to the maintenance of Laboratory Implementing Requirements (LIRs) that assist the Laboratory in identifying new projects that are of regulatory concern.
Regulatory Review and Permitting Team members	Perform CAA requirements applicability analysis of new, modified (operational changes), or relocated projects to determine regulatory requirements. Collect source information to make accurate regulatory assessments. Calculate emission estimates as appropriate. Document AQRs. Prepare comments with brief summaries of the project and the applicable requirements. Ensure that records are generated and maintained. Identify applicable technical reviewers and obtain technical reviews of AQR assessment. Inform the compliance team of new sources, new requirements, and changing conditions. Notify operations and facility personnel of compliance requirements. Ensure that the Air Quality Review LIR is current regarding applicability advice and guidance. Prepare and submit Exemption Notices as required by 20.2.72 NMAC.

5.4 Permitting

Purpose

The purpose of the permitting work process is to assist the operating groups and the Laboratory in obtaining required permits under the CAA requirements.

Requirement

Air Quality permits must be obtained from the New Mexico Environment Department and/or EPA for sources of air pollution that have applicable permitting requirements. Several permit programs apply to the Laboratory that are included in this project plan. These permit programs include:

- 20.2.70 NMAC - Operating Permits: This facility-wide permit includes all applicable CAA requirements.
- 20.2.72 NMAC - Construction Permits: These permits are emission unit-specific permits that are required for new or modified equipment or operations if applicable criteria are met. This permit program includes permit requirements for the National Emission Standards for Hazardous Air Pollutants (NESHAP) program, and the New Source Performance Standards (NSPS) program. This permit program also requires administrative permit revisions for the construction of sources and commencement of activities that qualify for exemptions under 20.2.72.202 B.
- 20. 2.74 NMAC - Prevention of Significant Deterioration (PSD): This permitting program is only applicable if LANL becomes a major source under the PSD definition.
- 20. 2.60 NMAC - Open Burning: Under this regulation, permits are required prior to conducting open burning.
- 40 CFR 61 Subpart H - Rad-NESHAP: Under this regulation, preconstruction applications are sent to EPA for new or modified projects that increase radiological emissions over a specified threshold.

Permits and Registrations

A list of current air quality permits are presented in Appendix A. In addition to the beryllium machining activities that are permitted and listed in Appendix A, LANL operates some registered beryllium activities that are listed in Appendix B.

5.4 **Permitting**, continued

Delegation of signature authority

DOE has delegated authority for MAQ to sign permit applications, modifications, and revisions required under 20.2.60 NMAC and 20.2.72 NMAC. DOE has also delegated signature authority for applications to construct or modify required under 40 CFR 61 Subpart H. The delegation was provided to streamline the permitting process and to help strengthen and clarify responsibilities. MAQ will continue to provide DOE the opportunity to review all draft permit correspondence with NMED and will continue to provide copies of final correspondence.

DOE has not delegated signature authority for permit applications, modifications, and revisions required under 20.2.70 NMAC.

Policy

MAQ will help Laboratory operating entities apply for, negotiate, and comply with air quality permits required by State and Federal CAA requirements. The Meteorology and Air Quality group will provide Laboratory operations with solutions allowing needed operational flexibility while minimizing air emissions, environmental impacts, and costs and complexity for maintaining compliance.

MAQ will also advise Laboratory subcontractors on the processes to apply for, negotiate, and comply with air quality permits. MAQ will provide advice to subcontractors with the intent of allowing needed operational flexibility while minimizing air emissions, environmental impacts, and costs and complexity for maintaining compliance.

Implementation

The following table lists specific responsibilities.

Who	What
Regulatory Review and Permitting Team Leader (*continued on next page)*	Assign permit application drafting tasks to team personnel. Identify the necessity for facility customers to fund permitting efforts. Consider outsourcing application preparation depending on staff availability. Ensure timely completion of permits. Review all applications and permitting decisions. Ensure interaction and peer review with operating groups impacted by the permit. Resolve issues/concerns related to permit issues.

5.4 **Permitting**, continued

Who	What
RR Permitting Team Leader, *continued*	Interact with the NMED or EPA on permit negotiations. Determine the need for permit revisions with input from group personnel.
Regulatory Review and Permitting Team members	Prepare draft permit applications that adhere to regulatory requirements and conform to operating parameters and are reviewed by appropriate operations personnel. Select appropriate emission factors or basis for emissions estimates. Ensure all calculations are peer reviewed. Obtain reviews for all permit applications. Reviewers may include MAQ management, legal counsel, DOE, facility customers, and other team personnel. The review should be performed to verify: • application is complete and in the proper format. • facility customer's needs and flexibility are incorporated. • equipment specifications and operating parameters are accurate. • proper and complete regulatory assessments have been made. Ensure that all products are reviewed by an authorized derivative classifier prior to LANL internal routing. Ensure that all products obtain security review prior to publication and external routing. Coordinate the public notification process. Request and coordinate the modeling assessment. Revise permits, as necessary. Maintain records including all background information for each permit application and ensure that complete files are submitted to the records room. Inform the compliance team of new permits, revisions to permits, and changing conditions to ensure that compliance personnel are assigned to design and implement procedures and to interact with operations personnel for each compliance program.

5.5 Regulatory Interpretations and Compliance Strategies

Purpose

The purpose of documenting regulatory interpretations and compliance strategies is to provide consistent and fair interpretation and implementation of CAA requirements and to foster transparency in LANL's compliance program.

Requirement

As the OIC for institutional air quality compliance, MAQ documents LANL's interpretation of regulatory language found in 20.2 NMAC and 40 CFR 50 – 99.

Policy

Develop an approach to:

- Ensure compliance.
- Comply with NMED and EPA policy and guidance.
- Ensure consistency in regulatory interpretation.

Applicability of 20.2.72 NMAC – Construction Permits and 20.2.73 NMAC – Notice of Intent

The installation of new or modified emission units or activities which meet the definition of modification in 20.2.72 NMAC must be assessed under the applicability requirements of Paragraph 2 of Subsection A of 20.2.72.200 NMAC to determine if a construction permit is required. Exemptions at 20.2.72.202 Subsections A and B must be considered to determine if the modification is exempt from permit requirements. For projects which qualify for a permit exemption under Subsection B of 20.2.72.202, an administrative permit revision will be filed as required.

New or modified emission units or activities which meet the definition of modification in 20.2.73 NMAC (same definition as 20.2.72 NMAC) are required to file a Notice of Intent (NOI) under Paragraph 2 of Subsection A of 20.2.73.200. Permit exemptions in 20.2.72 NMAC do not apply to the NOI requirement. However, NMED typically only requires an administrative permit revision, not an NOI, for exempted operations.

(continued on next page)

5.5 Regulatory Interpretations and Compliance Strategies, continued

Applicability of 20.2.72 NMAC – Construction Permits and 20.2.73 NMAC – Notice of Intent *(continued)*

Current NMED interpretation of the applicability provisions of 20.2.72 NMAC has excluded certain modifications from construction permitting due to language in the definition of stationary source with respect to the grouping of sources at research facilities. This verbal interpretation is unclear and subject to change. Therefore, an NOI will be filed for any modification which does not qualify for a permit exemption under 20.2.72 NMAC, and a written determination from NMED will be obtained. In cases where the modification will clearly be large enough to require construction permitting (for example, the potential emission rate of the modification itself exceeds 10 pounds per hour or 25 tons per year), a full permit application will be submitted as opposed to an NOI in order to reduce the permit process time.

Note: This direction addresses construction permit applicability for those pollutants for which there are NAAQS or NMAAQS. 20.2.72 NMAC contains additional applicability requirements for state toxic air pollutants as well as NSPS and NESHAP sources.

Asbestos

Asbestos D&D – A 10 working day notification to NMED is required prior to asbestos removal during demolition and major renovation activities. This demolition notification is required prior to performing any demolition activities, whether or not encountering asbestos is anticipated.

Asbestos Roofing Materials – The asphalt or coal tar residues should be sampled for asbestos after the roof is removed. If asbestos is detected, sandblasting should not be performed. NMED recommends a contained beadblasting operation equipped with an immediate vacuum to collect the beads and debris.

Asbestos Tanks – If tanks scheduled for demolition are coated on the outside, the coating should be sampled for asbestos. When tank demolition activities include the demolition of structural framework, notification to NMED is required, whether or not encountering asbestos is anticipated.

Asbestos Electrical Work – Electrical upgrades may involve equipment mounted on asbestos transite or high capacity cables/wire wrapped in asbestos cloth. In addition, old substations may have or use asbestos transite pipe as conduits. Care must be taken during any excavation activities.

5.5 Regulatory Interpretations and Compliance Strategies, continued

Boiler – Applicability of 40 CFR 60 Subpart Dc

The New Source Performance Standard (NSPS) at 40 CFR 60, Subpart Dc – Small Industrial-Commercial-Institutional Steam Generating Units -- applies to each boiler for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity equal to or greater than 10 MMBtu/hr but equal to or less than 100 MMBtu/hr. The affected facility is each boiler regulated under the NSPS.

Subpart Dc has emission standards for sulfur dioxide which apply to each boiler with a heat input capacity equal to or greater than 10 MM Btu/hr and which combusts coal and/or oil. Subpart Dc also has emission standards for particulate matter which apply to boilers with a heat input capacity equal to or greater than 30 MM Btu/hr and which combusts coal, oil, and/or wood. The emission standards for oil are applicable even if it is used only as a standby or emergency fuel. Boilers which only use natural gas as a fuel are not subject to an emission standard. However, natural gas-fired boilers are affected facilities under Subpart Dc and are subject to daily fuel monitoring and recordkeeping under §60.48c (g) and reporting under §60.48c (a).

Boiler design ratings

Design rating of boilers is used to determine regulatory applicability and to estimate potential to emit.

For LANL compliance, design rating for **atmospheric boilers** is based on an elevation adjustment (7500 ft above sea level) of the input rating as follows:

Design rating = Boiler plate input rating – 30%

The elevation adjustment is based on manufacturer-provided data of a 4% adjustment for every 1,000 ft above sea level.

The design rating for **forced draft, power burner, boilers** is based on an elevation adjustment of the input rating as follows:

Design rating = Boiler plate input rating – 15%

This method of de-rating boilers for altitude corrections is consistent with the methodology presented in LANL Facility Engineering Manual Chapter 6 – Mechanical at the time that the 2002 Operating Permit application was prepared.

5.5 Regulatory Interpretations and Compliance Strategies, continued

Proposed change to boiler ratings	Since the 2002 Operating Permit application was prepared, Facility Management has proposed a change in the elevation adjustment for the forced draft, power burner, boilers. For consistency in the LANL compliance program, and to be conservative, the forced draft, power burner, boilers will continue to be derated by 15%.
Characterization and sampling	Characterization and sampling activities that are conducted in order to determine the extent of contamination do not require air quality permitting due to the low levels of contamination, the small sample sizes collected, and the minimal disturbance of contamination during characterization activities. However, remediation activities have a greater potential to result in air emissions and will be reviewed before they begin in order to evaluate the need for air quality permitting.
Chemical tracking of HAPs and VOCs	Hazardous air pollutants (HAPs) and volatile organic compounds (VOCs) are regulated on a LANL-wide basis. Inventory systems and procurement records are used to track HAPs and VOCs used and emitted from LANL. It is recommended that procurement records go through the LANL inventory systems or are reported to MAQ.
Construction	Building and construction activities, which are not considered stationary sources of regulated air pollutants under the air quality requirements, are not subject to permitting under 20.2.70 NMAC and 2.72. In addition, non-process fugitive emissions of toxic air pollutants (TAPs) from stationary sources are exempt from permitting requirements for TAPs (20.2.72 NMAC, S.402(c)(10)). This class of sources includes construction sites, unpaved roads, coal piles, tailings piles, waste piles, and fuel and ash handling operations.

5.5 Regulatory Interpretations and Compliance Strategies, continued

Contractor owned, temporary, and portable sources

Temporary, portable contractor sources are not reasonably interpreted to be under the common control of LANL. Thus, they are not considered part of the Laboratory for air permitting purposes (20.2.70 NMAC and 20.2.72 NMAC). This type of source, if large enough to trigger construction permitting under 20.2.72 NMAC, should already have a construction permit issued by NMED. A relocation notice must be filed by the owner for the portable source to operate at a new location.

The portable source is not considered part of LANL, and therefore is not considered a modification to LANL for air quality permitting purposes.

EPA guidance (see "Major Source Determinations for Military Installations under the Air Toxics, New Source Review, and Title V Operating Permit Programs of the Clean Air Act") indicates that although in general contract-for-service activities are considered under the common control of the primary owner or operator (as opposed to leased activities), case-by-case determinations would be necessary. The guidance also does not mention or consider portable or temporary contractor sources specifically, but only contractor sources in general.

Emissions inventory – 20.2.73 NMAC annual report

LANL reports the following sources in the annual emissions inventory under 20.2.73 NMAC:

- Units with a 20.2.72 NMAC construction permit
- Units included in the 2002 Operating Permit Application
- Air emissions units not listed as Insignificant or Trivial Activities under the Operating Permit Program
- VOC and HAP emissions from R&D activities (based on chemical procurements)

5.5 Regulatory Interpretations and Compliance Strategies, continued

Enhanced rule

When using 40 CFR 61 Appendix D *Procedure* step (b) to estimate emissions of radioactive material, LANL will apply an enhanced version of the conservative "100 degree" rule. The enhanced rule is as follows: A radionuclide material that has a boiling point greater than 2000 °C and is heated to within 1000 °C of its boiling point or higher, or is intentionally dispersed into the environment, must be considered a gas. If the material is not heated to within 1000 °C of its boiling point, the material would be considered a solid or a liquid depending on its actual physical state at that temperature. The original rule will be applied to all radionuclides with a boiling point less than or equal to 2000 °C. See the Federal Facilities Compliance Agreement (dated May 1996) for documentation.

Exemptions under 20.2.72 NMAC for NSPS and NESHAP Sources

NESHAP and NSPS Exemptions – Per 20.2.72 NMAC, Section 202, exemption C, sources and units subject to 40 CFR Part 60 (NSPS) and 40 CFR Part 61 (NESHAP), with the exceptions noted below, that meet the notification requirements to which they are subject under NSPS or NESHAP are not subject to the applicability statement in Section 200 A.3. In the event that there are no notification requirements to which they are subject under NSPS or NESHAP, the notification requirements are considered to be met.

Exemption C does not apply to the following sources:

- 40 CFR 60 Subpart I – Asphalt Plant
- 40 CFR 60 Subpart OOO – Rock Crushers
- 40 CFR 61 Subpart C – Beryllium
- 40 CFR 61 Subpart D – Beryllium Rocket Motor Firing

Exemption C does not waive the applicability requirements of Section 200 A.1 or Section 200 A.2.

5.5 Regulatory Interpretations and Compliance Strategies, continued

Generators

To keep LANL below major source thresholds for PSD applicability in the Title V Operating Permit application, LANL requested limits on **stationary stand-by** generators use at an average of 168 hours/year/generator. Therefore stationary stand-by generator hours of operation must be carefully tracked and documented.

Requirements associated with the stationary stand-by generators are:

- MAQ must be notified prior to the purchase of any new stationary fuel-fired generator.
- MAQ will identify applicable requirements (exemption notification or permitting) under 20.2.72 NMAC and under 20.2.70 NMAC for new stationary fuel-fired generators.
- Each newly purchased stationary generator must be equipped with an hour meter.
- MAQ must be notified if stationary generators are relocated on site.
- Designated staff will record data from the hour meters periodically.

Stationary generators that are used in a manner other than stand-by or for emergencies may have additional permitting requirements under 20.2.72 NMAC and 20.2.70 NMAC.

MAQ must be notified prior to purchasing any new **portable** fuel-fired generators greater than 5.5 kw. This notification allows MAQ to track generators and to identify applicable requirements under 20.2.72 NMAC and 20.2.70 NMAC. Existing portable generators can be moved within the site without additional notifications (see relocation issues in this section).

Small generators with a capacity of 5.5 kw or less are considered to be trivial sources per NMED's List of Trivial Activities dated January 10, 1996. Trivial Activity #21 states: "Portable electrical generators that can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device from one location to another."

Landscaping and excavation

Landscaping and excavation activities may generate some particulate emissions. However, annual emissions generated from every day wind blown dust are generally higher than soil excavation emissions. Additionally, landscaping and excavating activities are considered maintenance and exempt from permitting under 20.2.72 NMAC.

5.5 Regulatory Interpretations and Compliance Strategies, continued

New Construction –Rad-NESHAP

Any installation or construction of a new building or stand alone structure at LANL (that emits radionuclides) will be considered "new construction" under the 40 CFR 61 Subpart H. New construction does not include (as an example) the installation of equipment such as a glovebox or exhaust system. As such, applicable requirements regarding the installation or construction of structures within LANL must be considered independent of other "physical or operational" changes for the purposes of air quality review. Accordingly, the dose contribution of each "new construction" must be checked. New construction that adds a net equivalent dose 0.1 mrem or greater must be submitted to EPA for prior approval. Any new construction that adds an equivalent dose less than 0.1 mrem is exempt from the requirement to obtain EPA approval, but must be reported as an exempt activity on LANL's annual report to EPA in accordance with §61.94(b) (8).

Portable source

From 20.2.70 NMAC, Section 107, a portable source is defined as any equipment mounted on a chassis or skid that can be moved. Additionally the equipment shall not be attached or clamped to any anchor, slab, or structure that must be removed prior to transporting the unit.

At LANL an additional criterion is used to determine if a piece of equipment qualifies as a portable source. The unit may not be situated in one location for more than 12 months and still be considered a portable source. This criterion is often used to determine which generators qualify as portable sources.

5.5 Regulatory Interpretations and Compliance Strategies, continued

Potential to emit

The requirement for an air quality permit is typically based on a source's "potential to emit" regulated air pollutants. This term is generally defined as:

> "The maximum capacity of a source to emit a pollutant under its physical and operational design."

Potential to emit is generally calculated assuming a source can operate at full capacity for 8760 hours per year. Any physical or operational limitation on the source can be treated as part of its design if the limit is federally enforceable. For example, air pollution control equipment, physical limitations on material throughput, or federally enforceable limits on hours of operations or material throughput can be factored in to the calculation of a source's potential to emit. When evaluating the need for an air quality permit, the source's potential to emit must be considered, regardless of planned actual usage of the equipment.

Each individual permitting regulation (e.g.. 20.2.70 NMAC, 20.2.72 NMAC, 20 NMAC 2.74) should be consulted for specific definitions and guidance on potential to emit. Additionally, EPA has published numerous guidance and White Papers on the issue of potential to emit for specific sources and facility types.

Potential to emit for R&D activities

Emissions from R&D activities are typically very small in total pounds emitted, and highly variable in the compounds or pollutants emitted due to frequent changes in the activities conducted. Because the issues of potential to emit (PTE) from R&D activities have never been agreed on or defined by NMED or EPA, LANL has always used maximum actual emissions to determine PTE. The use of maximum actual emissions is based on the fact that, unlike industrial sources, research activities are often short term without specified operating parameters. These maximum actual emissions exclude any air pollution control equipment and are based on the most reasonable worst case emissions for the specific research process. For the purpose of evaluating research activities this estimate is equivalent to the potential emission rate.

5.5 Regulatory Interpretations and Compliance Strategies, continued

Radionuclide air quality review strategy

Since the Federal Facility Compliance Agreement (FFCA) was signed in October 1996, project reviews for radionuclide emissions have been conducted by evaluating potential new/modified sources on a building-by-building (or area-by-area) basis, rather than a project-by-project basis. This building-to-building approach has been based on the current radionuclide usage survey (previously called the radionuclide emissions inventory), process information, and estimated dose equivalents to the nearest facility receptor and the Rad-NESHAP highest offsite dose. Under this air quality review approach, a new/modified project involving rad material is compared to the facility's existing inventory and monitoring configuration to determine the requirement for pre-construction notification and/or stack monitoring. If the project does not result in a change to the facility's current radionuclide inventory (i.e., no additional material and no change in the manner in which the material is processed/handled), then the project will not require pre-construction approval or any new/additional monitoring. This is based on the assumption that no change in inventory and processing or handling corresponds to no increase in emissions. A modification to a source (any physical or operational change) that does not result in an increase in emissions does not require pre-construction approval.

Reconstruction

Under 20.2.72 NMAC, Subpart IV – Toxic Air Pollutants, "Reconstruction" is defined as: a modification that results in the replacement of the components or addition of integrally related equipment to an existing source to such an extent that the fixed capital cost of the modification exceeds 50 percent of the fixed capital cost required to construct a comparable entirely new facility. NMED interprets the definition of "reconstruction" in the same manner as the Federal NSPS general provisions.

Under 40 CFR 60, Subpart A – New Source Performance Standards (NSPS) "Reconstruction" is defined as: the replacement of components of an existing facility to such an extent that the fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable entirely new facility.

5.5 Regulatory Interpretations and Compliance Strategies, continued

Reconstruction, *continued*

Under the NSPS, an affected facility is defined as "any apparatus to which a standard is applicable". Therefore when evaluating the applicability of various NSPSs to existing sources that are undergoing modifications or reconstructions, the capital cost of the individual piece of equipment must be considered.

Relocations – applicability of 20.2.72 NMAC requirements

The act of repositioning or relocating sources of air emissions or emission points requires written notification to NMED per 20.2.72 NMAC Section 202 (B)(4).

On June 16, 1999, LANL submitted a notification to NMED to cover the frequent relocation of all portable generators. Until NMED indicates otherwise, portable generator relocation notification requirements are satisfied.

Relocations – Under NESHAP Subpart A Provisions

Per 40 CFR 61 Subpart A (General Provisions - NESHAP), the relocation of an operation is not a modification.

Rad-NESHAP -- The relocation of an operation involving radioactive materials does not require pre-construction approval under 40 CFR 61 Subpart H (Rad-NESHAP). In addition, facilities that fall under Subpart H are exempt from the reporting and testing requirements of 40 CFR §61.10. The exemption is specified in 40 CFR §61.97. However, prior to the relocation, the estimated dose from the operation should be evaluated from the new location to determine the need for monitoring.

Beryllium-NESHAP -- Sources subject to 40 CFR 61 Subpart C (Beryllium-NESHAP) are not exempt from the reporting and testing requirements of 40 CFR §61.10. The relocation of beryllium machining operations must be reported to NMED under 40 CFR §61.10(c).

5.5 Regulatory Interpretations and Compliance Strategies, continued

Tanks

New Source Performance Standards (NSPS) Subpart Kb, "Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984", applies to any storage vessel with a capacity greater than or equal to 40 cubic meters (m3) that is used to store a "volatile organic liquid" (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984. There is no de minimis volatile organic compound (VOC) concentration below which Subpart Kb would not apply to a storage tank. Wastewater tanks containing dilute VOCs in aqueous solution are not exempt from NSPS Subpart Kb.

Implementation

The following table lists specific responsibilities.

Who	What
Regulatory Review and Permitting Team Leader	Ensure that regulatory issues and key terms are identified, evaluated, documented, and communicated to the appropriate personnel. Ensure that interpretation and strategy implementation is consistent and compliant with requirements.
Regulatory Review and Permitting Team members	Identify, evaluate, and document regulatory issues and key terms. Implement interpretation and strategy consistently. Obtain appropriate reviews.

Section 6
Design

Design

Policy The Regulatory Review and Permitting Team requires no hardware design activity.

Section 7
Procurement

Procurement

Policy Procurement of items and services used in the Regulatory Review and Permitting Team will follow the Laboratory procurement process and the requirements in the group QMP. Most items and services required for the team are commercial grade in nature and no special procurement requirements are needs or necessary. For items and all services for which special requirements are necessary, the Team Leader and team personnel will identify such items or services.

Section 8
Inspection and Acceptance Testing

Inspection and Acceptance Testing

Policy As needed, materials or services will be inspected and/or tested prior to acceptance for use. Most supplies used during performance of team activities are commercial grade in nature and require no special acceptance practices or procedures.

Section 9

Management Assessment

Project Management Assessments

Internal assessments

The Meteorology and Air Quality Group will conduct internal management assessments of all teams and programs in the group in accordance with requirements in the MAQ Quality Management Plan and procedure MAQ-029 ("Management Assessments"). This procedure requires periodic assessments by the group leader of the effectiveness of programs or teams. The Group Leader will perform an assessment of the effectiveness of the Regulatory Review and Permitting Team periodically. Assessments of the team will be documented and filed as records.

Responding to assessments

When violations of requirements are found during a management assessment, a deficiency report will be initiated to document the violation. Corrective actions will be tracked and documented in accordance with MAQ-026 ("Deficiency Reporting and Correcting").

Implementation

The following table lists specific responsibilities.

Who	What
Regulatory Review and Permitting Team Leader	Participate in internal management assessments as planned by the Group Leader. Implement program changes as recommended by the Group Leader as a result of assessments.
Group Leader	Conduct periodic assessments of the team according to the group QMP.

Section 10

Independent Assessment

Project Assessments

Policy

The Team Leader will ensure that adequate assessments are conducted by those outside MAQ. The MAQ Group Leader may request assessments of any program or team within MAQ. These assessments may also include MAQ's assessment of organizations that supply information to MAQ.

Implementation

The following table lists specific responsibilities.

Who	What
Regulatory Review and Permitting Team Leader	Request external assessments of the team as deemed necessary to provide assurance that the team meets applicable requirements.
Group Leader	Request assessments of the team as deemed necessary.

Appendix A

Permits

Source	Permit	Date issued	Expiration date
Rock Crusher	Construction Permit #2195	June 16, 1999	Initial start-up must occur before June 16, 2004
Be Machining at TA-3-102	Construction Permit # 636	March 19, 1986	None
Be Machining at TA-3-141	Construction Permit # 634-M2	October 30, 1998	None
Be Machining at TA-35-213	Construction Permit # 632	December 26, 1985	None
Be Machining at TA-55-4	Construction Permit # 1081-M1-R3	July 1, 1994 Revised March 11, 1998	None
Operational Burning at TA-16	Open Burning: TA-16-OB-2003	December 27, 2002	December 31, 2007
Operational Burning at TA-11	Open Burning: TA-11-OB-2003	December 27, 2002	December 31, 2007
Operational Burning at TA-14	Open Burning: TA-14-OB-2003	December 27, 2002	December 31, 2007
Operational Burning at TA-36	Open Burning: TA-36-OB-2003	December 27, 2002	December 31, 2007
Air Curtain Destructors	Open Burn Permit	June 20, 2001	Extended through September 30, 2003
FGR Installation at the Power Plant	Construction Permit #2195-B-R1	September 27, 2000	None
TA-33 Generator	Construction Permit 2195-F	October 10, 2002	None
Asphalt Plant	Construction Permit GCP-3-2195G	October 29, 2002	None

Permits no longer active

Source	Permit	Date issued	Expiration date
Be Machining at TA-3-39	Construction Permit # 635	March 19, 1986	None
Operational Burning	Open Burning	August 18, 1997	December 31, 2002
Prescribed Burning	Open Burning	February 26, 1999	December 31, 1999

Appendix B

Registered Be Sources

Site	Operations
TA-3-29	cutting, snipping, melting, alloying
TA-3-SM-66	electroplating/chemical milling final polishing of metallographic specimen
TA-35-87	cutting and snipping of foil

Be sources no longer active

Site	Operations
TA-3-1819	alloying, arc melting, cutting
TA-16-450 was moved to TA-16-207	wet sanding, spot welding

Appendix C

References

Requirements and guidance documents:

Title 20 Chapter 2 of the New Mexico Administrative Code Sections 1-99 [http://www.nmenv.state.nm.us/NMED_regs/aqb_regs.html]

Title 40 Code of Federal Regulations Parts 50-99 [http://www.access.gpo.gov/nara/cfr/cfr-table-search.html]

LIR 300-00-01, "Safe Work Practices", October 6, 1999

LIR 404-10-01, "Air Quality Reviews," October 2, 1998

LIR 300-00-02, "Documentation of Safe Work Practices," October 6,1999

FFCA, "Appendix A Compliance Plan" of the "Federal Facility Compliance Agreement," June 1996

LANL Facility Engineering Manual Chapter 6 -- Mechanical

"Major Source Determinations for Military Installations under the Air Toxics, New Source Review, and Title V Operating Permit Programs of the Clean Air Act", John Seitz, Director, EPA OAQPS, August 2, 1996.

Group MAQ documents:

MAQ-QMP, "Quality Management Plan for the Meteorology and Air Quality Group"

MAQ-ASBESTOS, "Quality Assurance Project Plan for the Asbestos Report Task"

MAQ-BeNESHAP, "Quality Assurance Project Plan for the Beryllium NESHAP Compliance Team" (in preparation)

MAQ-RN, "Quality Assurance Project Plan for the Rad-NESHAP Compliance Project"

MAQ-022, "Preparation, Review, and Approval of Procedures"

MAQ-024, "Personnel Training"

MAQ-025, "Records Management"

MAQ-026, "Deficiency Reporting and Correcting"

MAQ-029, "Management Assessments"

MAQ-030, “Document Distribution”

MAQ-032, “Orienting New Employees”